



October 15, 2022

Honorable Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Modernizing the E-rate Program for Schools and Libraries,*
WC Docket No. 13-184
Promoting Fair and Open Competitive Bidding in the E-Rate Program,
WC Docket No. 21-455
Schools and Libraries Universal Service Support Mechanism,
CC Docket 02-6

Dear Secretary Dortch:

On October 11, 2022, the 49 SECA members listed in Exhibit A, representing 32 states and two territories, met with the following members of the Telecommunications Access Policy Division of the Wireline Competition Bureau: Johnnay Schrieber, James Bachtell, Kate Dumouchel, Mark Nadel, Molly O'Connor, Johnny Roddy, and Joseph Schlingbaum.

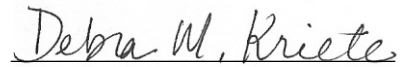
SECA initially focused on the October 7, 2022 *ex parte* letter submitted jointly by SECA, SHLB Coalition and the Consortium for School Networking (CoSN) concerning the proposed mandatory national bidding portal in WC Docket No. 21-455.¹ The discussion then moved to areas where additional details and information may be helpful to further develop the record, such as identification of those billed entities with their own established electronic bidding portals. SECA is going to try to compile this information and submit it for the record in the near future. SECA also plans to identify and describe those areas where existing bidding procedures at the state and local levels conflict with the proposed bidding portal and procedures proposed in the *NPRM*.

Additionally, SECA asked for clarification of the cardinal change principle in the bidding process, in WC Docket No. 13-184, It is important for applicants to understand when a modification or clarification of bidding specifications constitutes a cardinal change that requires

¹ <https://www.fcc.gov/ecfs/search/search-filings/filing/100824052277>

the bidding deadline to be 28 days from the day that the additional information is disseminated. SECA plans to submit a list of circumstances, and our proposed analysis and conclusion whether the situation constitutes a cardinal change, in the near future and will request written guidance on these topics.

Respectfully submitted,



Debra M. Kriete

Chairperson

State E-rate Coordinators' Alliance

1300 Bent Creek Blvd, Ste 102

Mechanicsburg, PA 17050

717 232 0222

dmkriete@comcast.net

cc: Johnnay Schrieber
James Bachtell
Kate Dumouchel
Mark Nadel
Molly O'Connor
Johnny Roddy
Joseph Schlingbaum

Exhibit A - List of SECA Attendees

State/Territory	Name
Alabama	Sue Ellen Gilliland
Alaska	Valerie Oliver
American Samoa	Sophia A Fa'agata-Ah Fook, Ana Vaiiau
Arkansas	Don McDaniel, Dirk Schroder
California	Cathy Benham, Ali Dias, Rosey Campos
Colorado	DeLilah Collins
Delaware	Vince LaForgia
Florida	Kelly Bruce, Keith McCaskill
Georgia	Charlie Jackson
Hawaii	Kathy Carroll
Idaho	Daniel Vogt
Illinois	Melinda Fiscus
Indiana	Brad Hagg
Iowa	Pamela Jacobs
Kentucky	Scott Kane
Louisiana	Carol Mosley, Caroline Wolf
Maine	Anne Perloff
Michigan	Joseph Polasek, Andrew Epting
Mississippi	Lee Bray
Nebraska	Christina Struebing, Becca Kingery
Nevada	Mel Van Patten
New Mexico	Andy Eisley
New York	Winston Himsworth
North Carolina	Adam Benjamin, Susan Boros, Jill Elbersen, Roxie Miller, Lyell Walker
Ohio	Lorrie Germann
Oregon	Kaylen Dinsmore, Jen Thul
South Carolina	Victoria Gooch
South Dakota	Debra Kriete
Tennessee	Kim Friends, Candice Hall
Utah	Jerome Browning
Virginia	Susan Clair
Washington	Susan Tenkhoff
Wisconsin	Bob Bocher, Rachel Schemelin
Wyoming	Clementina Jimenez